

The Smallest States The Strongest Voice

FEDERAL LEGICION COM. POSICA OFFICE OF CENERAL COUNSEL

Jeff S. Jordan, Esquire Supervisory Attorney Federal Election Commission 999 E Street NW Washington, DC 20463

1 2006 JUN 28 1P 2: 28

June 27, 2006

RE: MUR 5750

Dear Mr. Jordan,

Please accept this letter as a formal response to the Complaint filed by the Chafee for Senate campaign against the Laffey US Senate campaign. The Chafee campaign makes essentially three allegations against Laffey US Senate. They will be addressed in the order they were made.

I. RESPONSE TO ALLEGATION 1 (Indeglia letter)

The Chafee for Senate campaign alleges that Mr. Indeglia and the Laffey campaign were in coordination over letter circulated by Mr. Indeglia. According newspaper accounts, Mr. Indeglia, president of American Labor Services, sent a letter to his employees requesting support Stephen P. Laffey for U.S. Senate soliciting their assistance in compiling a voter list.1 This same news accounts unequivocally state that the Laffey US Senate campaign had no involvement with Mr. Indeglia's letter. The statements by both Mr. Indeglia and the Laffey US Senate campaign are consistent that Mr. Indeglia drafted and circulated this letter without any involvement US encouragement from the Laffey Senate campaign. Furthermore, the Laffey US Senate does not have and never had any list of voters arising from this letter sent out by Mr. Indeglia.² Any violations of federal law committed by Mr. Indeglia are not the responsibility of the Laffey US Senate campaign since the Laffey US Senate campaign did not have any involvement with this letter and has received

 $^{^{1}}$ Providence Journal 4/25/2006 and 4/26/2006 (attached to the complaint filed by the Chafee campaign).

² Affidavit of John Dodenhoff, Campaign Manager of Laffey US Senate (attached to this response).

nothing of value derived from this letter. To be even more specific, Mr. Indeglia was not authorized in any way by the Laffey US Senate campaign to draft or circulate this The Laffey campaign can not be held liable or responsible for activities of independent third entities or activities individuals who éngage in that were assisted in by the Laffey authorized nor US campaign. Both Mr. Indeglia and Laffey US Senate have indicated that there was no coordination regarding this letter, and the Chafee campaign cannot present any evidence Thus, the Commission should dismiss this of coordination. complaint against Laffey US Senate.

II. RESPONSE TO ALLEGATION 2 (Direct Mail Expenses)

The Chafee for Senate campaign alleges that Laffey US Senate campaign has failed to properly account for its direct mail expenses. According to a newspaper account, the Laffey US Senate campaign estimated its direct mail expenses as of approximately April 25, 2006 to be \$69,549.3 However, according to the Chafee campaign's calculation of the Laffey US Senate campaign finance reports as of March 31st, 2006, the reported direct mail expenses were approximately \$18,256.4 There are two simple explanations for this difference. First, the Laffev campaign incurred more direct mail expense subsequent to March 31, 2006, the end of the first reporting quarter of Second, the Laffey campaign did not receive invoices from its direct mail vendor exceeding the total of \$18,256 until after March 31, 2006. The Laffey US Senate campaign pays its direct mail expenses once it receives an invoice from its direct mail vendor. As of March 31, 2006, the Laffey US Senate had not received invoices for direct mail expenses exceeding the amount of \$18,256. As will reflected in this quarter's campaign finance report, the Laffey campaign subsequently received additional invoices and will have spent more than \$69,549 in direct mail expenses for this election. 5 All direct mail expenses for which the Laffey US Senate campaign received an invoice from its direct mail vendor have been paid and accounted for in the quarter ending June 30, 2006, and this amount

³ Providence Journal 4/25/2006 (attached to Chafee complaint).

⁴ Chafee complaint.

⁵ Affidavit of John Dodenhoff, Campaign Manager of Laffey US Senate.

will exceed \$69,549. The report for the quarter ending June 30, 2006 will reflect all of the direct mail billings as of that date. Thus, the Commission should dismiss this complaint against Laffey US Senate.

III. RESPONSE TO ALLEGATION 3 (Earmarked contributions)

The Chafee for Senate campaign alleges that Laffey US Senate did not properly disclose all of its contributions including contributions it received earmarked through the First, the Laffey US Senate campaign has Club for Growth. disclosed all contributions it received in the amount of \$200 or more, including the name of the donor, the address, the occupation, the employer, date received and amount. Specifically, the Laffey US Senate campaign disclosed every donor who earmarked a donation through the Club for Growth. The question is whether in filing its campaign finance reports, the Laffey campaign was required to indicate if the donation was earmarked through the Club for Growth. Interpretation of the technical statutes and regulations of campaign finance is a daunting task for any first time candidate, and these statutes and regulations are subject to multiple interpretations. The federal election statute, which the Laffey US Senate campaign followed in filing in reports regarding earmark contributions, state that: "The intermediary or conduit shall report the original source intended recipient such contribution of Commission and to the intended recipient". Since the Club for Growth disclosed the earmark contribution, there is no violation of federal law. In fact, there is no mention in federal statutes of requiring a candidate's campaign to report the conduit. It appears that other US Senate campaigns have interpreted federal law in the same manner as the Laffey US Senate campaign. Senators Kyl (AZ), DeWine (OH), Hatch (UT), Talent (MO), and Santorum (PA) each of whom received earmarked contributions from Senator Frist's Volunteer PAC, all list on their campaign finance reports the individual donors but not the conduit through which the contributions were bundled.7 Three of the five Senators mentioned above sit on the US Senate Judiciary Committee.

⁶ 2 USC 441a(a)(8).

⁷ Excerpts from the relevant campaign finance reports are attached to this response.

The regulation cited by the Chafee for Senate campaign can be interpreted to require a candidate disclose the conduit, but this regulation appears conflict with the statute mentioned above. However, avoid any confusion, the Laffey US Senate campaign has already submitted to the Commission a copy of all earmarked contributions that were received through the Club for Growth, and after discussion with its case manager at the Commission, the Laffey US Senate campaign will amend its campaign finance reports no later than July 31, 2006 to specifically indicate which donations were earmarked through the Club for Growth. In any case, the Laffey US Senate campaign has made it best efforts in filing its campaign finance reports to comply with all the technical requirements of federal campaign finance law, which subject to competing interpretations. Under federal law, the Laffey US Senate campaign is only required to make "best efforts" to "obtain, maintain and submit information required by the Act".8 The Laffey campaign made "best efforts" to comply with federal law in filing its campaign finance reports. Thus, the Commission dismiss this complaint against Laffey US Senate.

Sincerely,

Richard J. Sullivan

Treasurer

Laffey US Senate

Attachments

^{8 2} USC 432(i) and 11 CFR 104.7.

Re: **FEC**

MUR No. 5750

AFFIDAVIT

Now comes John Dodenhoff, Campaign Manager for Laffey US Senate, under oath, deposes and states as follows:

- Mr. Indeglia drafted and circulated the letter, sent out under American Labor Services letterhead, without any involvement or encouragement, directly or indirectly, from the Laffey US Senate campaign, including its candidate, employees, or consultants.
- The Laffey US Senate campaign, including its candidate, employees, and consultants, does not have and never had any list of voters arising from the letter, sent out under American Labor Services letterhead, by Mr. Indeglia.
- Mr. Indeglia was not authorized or encouraged in any way by the Laffey US Senate campaign, including its candidate, employees, or consultants, to draft or circulate the letter sent out under American Labor Services letterhead.
- The Laffey US Senate campaign did not receive invoices from its direct mail vendor exceeding the total of \$18,256 until after March 31, 2006.
- 5. The Laffey US Senate campaign pays its direct mail expenses once it receives an invoice from its direct mail vendor.
- 6. As will be reflected in this quarter's campaign finance report, subsequent to March 31, 2006, the Laffey US Senate campaign received additional invoices from its direct mail vendor and will report more than \$69,549 in direct mail expenses for this election.

n Dodenhoff

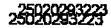
Subscribed and sworn to before me this 27 day of June 2006.

Notary Public

My Commission Expires: 4262009

SUBTOTAL of Receipts This Page (optional) ...

TOTAL This Period (last page this line number only) ..



FOR LINE NUMBER: PAGE 118/509 SCHEDULE A (FEC Form 3) Usa separate achedule(s) (check only one) or each category of the **ITEMIZED RECEIPTS** 118 116 Detailed Summary Page 12 13a 136 Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (In Full) Jon Kyl for U.S. Senate Full Name (Last, First, Middle Initial) MR ARWAY CLICK Date of Receipt Mailing Address 6323 E Gold Dust Avenue 05 2005 Transaction Et: 50601.C45280 City State Zip Code Amount of Each Receipt this Period Paradise Valley 85253 FÉC IO number of contributing 1000.00 C lederal political committee. Receipt Name of Employer AZ Medical Imaging Occupation Limit incressed Due to Opponent's Spending (2 U.S.C. 441a(i)/441a-1) Radiologist Receipt For. 20D6 Election Cycle-10-Date 1 X Primary General 1000.00 Other (specify) w Full Nume (Lust, First, Wicklife Intillet) B. MRS. Virginia Clark Date of Receipt Mailing Address 10585 S Las Colinas Lane 05 03 2005 Zip Code Transaction ID: 50601.C44788 City Shale Amount of Each Receipt this Period 85367 Yuma FEC ID number of contributing 50.00 federal political committee. Receipt Name of Employer Öccupation Limit Increased Due to Opposent's Spending (2 U.S.C. 441a(i)/441a-1) Housewile Election Cycle-to-Date 🔻 Receipt For 20X16 X Primary General 550.00 Other (specify) @ Full Name (Lest, First, Middle Initial) C. MR James Chylan Darle of Receipt Mailing Address 3340 Lakeview Drive 25 .2005 Transaction ID: 50801_C44413 Cilv State Zip Code 37919 Amount of Each Receipt this Period TN Knowille FEC ID number of contributing 2000.00 C federal political committee. Receipt Occupation Name of Employer Clayton Homes Lintil Incressed Due to Opponent's Spending (2 U.S.C. 441s(i))441a-1) Owner Election Cycle-to-Daie T Receipt For: 2006 General X Primary 2000.00 Other (specify) 3050.00

FEGSchedule A (Farm 3) Flor. 02/2003

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s) or each category of the Detailed Summary Page

FOR LINE	NUMBER:	PAGE	PAGE 58/718					
(check only	onej							
X 11a	116	116] 12					
13	7 14 7	7 45 F	7 48	_ _				

		Detailed Summa	ary Page	<u> X</u> 1'	-	→	116	110	\vdash	12	
	 			13			4	15	\perp	16	<u> </u>
Any information copied from such Reports a or for commercial purposes, other than using	the name and ad	August of such bounds	o by any para dicommittee t	o solicit es	upup Daub	utio	ue llo	m such	com	mittee	1 5
NAME OF COMMITTEE (In Ful)											
Volunteer PAC											
Full Name (Lest, First, Middle Initial) A. Alden W. Chunen						leci	eict				
Mailing Address 35 Aster Ave							•	, .		005	•
City	State	Zip Code		Tran	acti	ion l		0704.0	:366	18 1	
Hillsborough	CA	94010	 	<u> </u>				eceipt ti			
FEC ID number of contributing federal political committee	C								5	00.00	כ
Name of Employer Retired	Occupation Retired			Rece	pt						
Receipt For:	Appregate	Year-to-Date 🛡		1							
Primary General	1		500.00	1							
Other (specify) w			000.00								
Full Name (Lest, First, Middle Inibal) James Claylon				Date	of R	ec c	ipt				
Mailing Address 334D Lake View Dr	TVB			7 4	y .	• 1	1 2	, ,		105	T
City	Siste	Zip Coda		Trans	acti	on I	in: 50	0718.C	460	83	
Knowille	TN	37919		Amo	ınt o	ľE	ich R	sceipt ti	is P	bohe	
FEC ID number of contributing tederal political committee C CD0368237				2000.00							
Name of Employer Clayton Homes	Owner			- Earm	irke	d(N	lande	e po sibe	id)		
Receipt For:	Aggregate	Year-to-Date 🔻		·(MEM	חס	ŒN	n				
Primary General			0.00	Earm	ırke	d F	or CI	AFEE	i, LA	\ -	
Other (specify) •			5,05	COLN	υįε	æn	ane.r	a,uu			
Full Name (Lest, First, Middle Initial) James Claylon				Date	of R	esti	ipt		-		
Mailing Address 3340 Lake View Dri	ve					•	1 n	. •	20	05	•
City	State	Zip Cede						1718 C			
Knowlie	IN	37519		Amo	int al	F Ea	ich Re	ceipt th	s Pe	hoin	
FEC ID number of contributing federal political committee	© cm	279521								00.00	l
Name of Employer Occupation Clayton Homes Owner				Earma	rke	d(N	lande	ipasita	d)		
Receipt For:	Aggregate	Year-to-Date 🔻		 {MEM	דו כ	ΈM	п				
Primary General	1		0.00					'L, JOI	1,5 e	!-	
Other (specify) •			0.00	naba.A	Z,Q(J					
						_					

SCHEDULE A ((ITEMIZED RECI	IPTS	Use separate schedule or each category of the Detailed Summary Pag	gs 11a 11b X 11c 17d 17d 12 13a 13b 14 15
NAME OF COMMITT Mike DeWine for L Full Name (Last, First The Firencial Barvices	EE (in Full) IS Senate Middle Entral)	and address of any political cor	THE THE TO REPORT SOUTH DESIGN SHORT COMMITTEE.
Mailing Address 100 City Washington FEC ID number of corrected political comm	11 Pennsylvania Ave. Stel	e Zip Code 2004 C00193177	Date of Receipt M
Name of Employer Receipt Far: X Primary Other (apacity)-	General	on Cycle-16-Date 🔻	Receipt Limit Increased Due to Opponent's Spanding (2 U.S.C. 441aii)M41a-1)
City New York FEC ID number of confederal political commit Name of Employer Repelpt For:	Foliar Government 5 Avertue Of The Americas 6 Instelled NY ributing 100. C. C	10019-6031 200384497	Cale of Receipt 1
City Washington FEC IO number of contributed political commits Name of Employer Receipt For: 20	Fund for Effec Thirtmanth St., NW, Ste. 34(State DC Butting Be. C C	Zip Code 2005 00010470	Data of Receipt 10 to 7 p p 7 7 9 7 7 9 7 9 9 6 3 0 2 0 0 5 Transaction ID: 50702.C142491 Amount of Each Receipt this Period 1000.00 Receipt Limit Increased Due to Opponent's Spending (2 U.S.C. 441a(8/441a-1)
	is Page (optional)		3000.00
1 - 1 ma cetton tiggs ba	ge this line number only)	f	•

FEC Schedule A (Farm 3) Rev. \$272003

SCHEDULE A (FEC Form 3X)		Use separate schedule(s)		FOR LINE NUMBER: PAGE 429/718			
ITEMIZED RECEIPTS		or each categ Detailed Sum		118 11b X 11c 12 13 14 15 16 17			
Any information copied from such Reports and 5 or for commercial purposes, other than using the	Raiements ma name and ad	y not be sold or a	used by any persional committee to	on for the purpose of soliciting contributions solicit contributions from such committee			
NAME OF COMMITTEE (in Ful) Volunbeer PAC							
Full Name (Lest, First, Middle Initial) A. The Financial Services Roundtable PAC	······			Date of Receipt			
Mailing Address Mr. Steve Bartlett 1001 Pennsylvania Aye	NW .			04 15 2005			
City	State	Zip Code		Transaction ID: 50718 C46678			
Washington	DC	20004		Arrount of Each Receipt this Period			
FEC ID number of contributing federal political committee.	C co	03651 06		1000.00			
Name of Employer	Occupation	п	· · · · · · · · · · · · · · · · · · ·	Earmsrked(Nondeposited)			
Receipt For: Primery General Other (specify) •	Apgregate	a Yser-to-Date ♥	5000.00	[MEMO ITEM] Earmarked For SANTORUM, RICHARD J,Senate,PA,D0			
Full Nama (Lest, First, Middle Initial) B. The Financel Services Roundiable PAC				Date of Receipt			
Mailing Address Mr. Stave Bartlett 1001 Pennsylvania Ave City	, NW State	Zip Coda		04 15 2006 Transaction ID: 50718.C46095			
Washington	DC	20004		Antount of Each Receipt this Period			
FEC ID number of contributing federal political committee	C co	1366237		1000.00			
Name of Employer	Occupation	1		Earmarked(Nondeposited)			
Receipt For: Primary General Other (specify) •	Aggregate	:Year-ko-Date ♥	5000.00	[MEMO ITEM] Earmarked For CHAFEE, LIN- COLN D, Senste, RI, OD			
Full Name (Last, First, Middle Initial) The Financial Senices Roundable PAC				Date of Receipt			
Mailing Address Mr. Steve Bartlett 1001 Pennsylvania Ave City	, NW State	Tin Paulo		04 15 2005			
Washington	DC	Zip Code 20064		Transaction ID: 50718.C46068 Amount of Each Receipt this Period			
FEC ID number of contributing federal political committee	_	364497		1000.00			
Name of Employer	Occupation	, , , , , , , , , , , , , , , , , , , 		Earmarked(Nondeposited)			
Receipt For: Primary General Other (specify) •	Aggregate	Year-to-Date ▼	5000.00	[INEMO ITEM] Earmarked For DEWINE, RIC-HARD MICHAEL, Senate, DH, 00			
SUBTOTAL of Receipts This Page (optional)			>	0.00			

TOTAL This Period (less) page this line number only)

25020330787 25020330787

SCHEDULE A (FECForm 3) ITEMIZED RECEIPTS

Use separate schedule(s) or each category of the Detailed Summary Page

(chack onl		c : Ewd	E 1021259	<u>.</u>
X 11a	11b	110		_
T 19	13m	476	ᄗᇻ	7 95

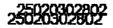
HEMIZED RECEIPTS		Detailed:	Билитегу Раде	×	11a 12	_	116	Ц	110	4	11d	Ci.e.
Any information copied from such Reports and or for commercial purposes, other than using the	Statements n	nay not be s	old or used by any p	xerson	for the	DUN	13a	of a	13b Olicfling	ا د	14 antifb	utiona
NAME OF COMMITTEE (in Full)	a seema and		il hounces excesses			TH SPEE	المماد	3 III	On it SOC		AC HZ I	4960,
HATCH ELECTION COMMITTEE, INC.	•											
Full Name (Last, First, Middle Initial) A. Richard J. Hale					Cate of	Re	celpt					
Mailing Address 110 Clairement Cove] [DB	•	2		2		05	*
City ·	State	Zip Cod	8 ,	L	Tenauc	tlar	n ID: t	506	28.C2	25	12	
Ridoeland	<u>MB</u>	39157		- :	AMOUNI	i of I	Each	780	eipt this	5 P	erice	
FEC fD number of contributing federal political committee.	C					` 				2DI	00.00	
Name of Employer BlueCross BlueShield	Occupation PRESIDE	n ENT & CEO	· · · · · · · · · · · · · · · · · · ·	-	eceipt - Limit	Inc	TB250	d Dy	e lo O	F.	oneni	ls.
Receipt For: 2006	Election C	ycla-to-Cata	7	7 "	i Spen	MIX	g (2 v	.ə.(;, 4418	(ih.	44 (3)	נוי
			2000.00									
Full Name (Last, First, Middle Initial) B. Frank J Hanne					Date of	Rec	pelp4					
Malling Address 535 Silverleef Drive		,			0.6	[29]	2	۳۳۲ Q ا	05	
City	State	Zip Cod	•	7	المسعد	tlon	1 ID: 5	07	D6.C21	:5	97	
Summendie	GA	30747		-1 4	Amount	qf £	Eạch i	jec	eipt this	P	eriod	
FEC ID number of contributing federal political committee.	C					_				200	10.00	
Name of Employer Worldwide, incorporated	Occupation CHIEF E	A XECUTIVE	OFFICER	1	ecelpt Limit	ļņa	rensa	l Di	e io O	ppi	ineri	ls.
Repelpt For:2006	Election C	ysie-to-Date	Ŧ	1-	J Spen		(Z U.	5.0	. 441a		1418	1)
Primary General		<u> </u>	2000.00									
Full Name (Last, First, Middle Initial) 3. John J. Hannen			· · · · · · · · · · · · · · · · · · ·		Date of	Rec						
Mailing Address c/o Norman Brownstein 410 Seventeenth Sinet	. 22 Floor			1	04	′[21	ľ	[2	0	05]
City	State CO	Zip Godi 80202)		ransaci							
FEC ID number of centributing federal positical committee.	C	• • • •				,			-	~	0.00	
Name of Employer Information Requested	Occupation	r Kaquest	ad	Fall	oceipt Limit	inci	essed) Du	e to Op	يجرو	ment.	.
Receipt For: 2006	Election C	ycle to Öste	¥	7-	7 Sbau	ding	(2 U.	5.C	. 441a(М	H18-	1)
X Primany General Gitter (specify) er			200D.00						-			
SUBTOTAL of Receipts This Page (optional)		•9••							60	100	0.00	
TOTAL This Period (last page this line number	only)									730		

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s) or each category of the Detailed Summary Page

FOR LINE	NUMBER:	PAGE 136 / 718					
(check only	r anej						
X 11a	116	110	12				
T 42		45 [140	_ □ 47			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (In Ful) Volunteer PAC Full Name (Last, First, Middle Initial) Frank, Hanna Date of Receipt Mailing Address 245 Perimeter Center Parkway % " , U U , 04 12 2005 Suite 300 State Zip Code Transaction ID. 50718 C46101 30346 GA <u>Atlanta</u> Amount of Each Receipt this Period FEC ID number of contributing 2000.00 C C00366237 federal political committee Earmarked(Nondeposited) Name of Employer Workwide Inc Occupation CEO Receipt For. Appregate Year-to-Date 🚩 [MEMO ITEM] Printery General Earmarked For CHAFEE, LIN-COLN D. Senate, RI, 00 0.00 Other (specify) w Full Name (Lest, First, Middle Initial) Date of Receipt Frank, Hanna 1 7 7 0 0 04 12 Mailing Address 245 Perimeter Center Parkway 12 2005 Suite 300 Zip Code City Siste Transaction ID: 50718.C46075 <u>Atlanta</u> 30346 Amount of Each Receipt this Period FEC ID number of contributing 2000.00 C CD0104752 federal political committee Earmarked(Nondeposited) Name of Employer Worldwide Inc Occupation CEO Receipt For: Aggregate Year-to-Date Y [MEMO ITEM] Pomery General Earmarked For HATCH, ORRIN G, Senste, UT,00 0.00 Other (specify) Full Name (Last, First, Middle Inibal) C. Frenk Hanna Date of Receipt Mailing Address 245 Perimeter Center Parkway 2005 12 Suite 300 City Slate Zip Code Transaction ID: 50718 C48684 Atlanta GA 30349 Amount of Each Receipt this Period FEC ID number of contributing 2000.00 C CD0365108 federal political committee. Earmarked(Nondeposited) Name of Employer Worldmide Inc Occupation CEO Receipt For: Aggregate Year-to-Date ¥ MEMO ITEM General Primary Earmarked For SANTORUM, RICHARD J, Senabe, PA DO 0.00 Other (specify) 🛊 0.00 SUBTOTAL of Receipts The Page (optional) TOTAL This Period (last page this line number only)



SCHEDULE A (FEC Form 3)

Use separate schedule(s)

FOR LINE		PAG	E 168/	574
`	, G.I.⊒, ∏ 116 [11¢		
	199	135	T 14	

ITEMIZED RECEIPTS	or each category of the Defailed Summary Page	X 11a 11b 11c 11d
Any information copied from such Report	a and Statements may not be sold or used by any painted to make the sold or used by any painted committee.	eraph for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full)	and the name and decrees of any political continues	e to soilch contributions harn salm daminitaes.
Talent for Senate, Inc.		
Full Name (Last, First Middle Inibal) A. Glen Gemet		Date of Receipt
Mailing Address Rurel Route 1, Bo	x 41a	06 30 2005
City Purdy	State Zip Code MO 65734-	Transaction ID: 50707.C59828 Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	100.00
Name of Employer First State Bank	Gecupation Banking	Receipt Limit Increased Due to Opponent's
Receipt For: X Primary General Other (specify)—	Election Cycle-to-Date ▼ 4200.00	Spending (2 U S.C. 441a(i)/441a-1)
Futi Name (Lest. First. Middle Initial) 8. Faith Geier		Date of Receipt
Mailing Address 10 Grecie Sq.		06 30 2005
City New York	State Zip Code NY 10028-	Transaction ID: 5D707.C6D444 Amount of Each Receipt this Period
FEC ID number of contributing faderal political committee.	C	2000 OD
Name of Employer None	Occupation Homemaker	Receipt Limit Increased Due to Opponent's
Recaipt For: X Primary General Other (apecify) —	Election Cycle-4o-Date 7 2000.00	Spending (2 U.S.C. 441e)()/441a-1)
Full Name (Last, First, Middle Indial) C. Marrin Gelber		Date of Reveip!
Mailing Address 21 Sackston Wood	ds Lane	;05 05 2005
City	State Zip Gode	Transaction ID: 507D7.C57249
Saint Louis	MD 63141-	Amount of Each Receipt this Period
FEG ID number of contributing federal political committee.	C	! . 10D.0D
Name of Employer Maivin Gelber Enterprises	Occupation Real Estate	- Receipt - Limit increased Due to Opponent's - Spending (2 U.S.C. 441a())441a-1)
Receipt For:	Election Cycle-to-Date 🖤	Abtained to Arters an infiltration.
X Primary General Other (specify) —	275.00	
	pnal)	. 2200.00

SCHEDULE A (FEC Form 3X)

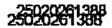
Use separate schedule(s)

FOR LINE	NUMBER	: PAG	E 105/	718
(check only	• .			
X 11a	116	11c	12	
T 49	7 44 1	7.5	□ 46	

ITEMIZED RECEIPTS		Detailed Summ	nery Page	X 118 11b 11c 12 13 14 15 16 17
Any information copied from such Reports and or for commercial purposes, other than using t	d Statements ma the name and add	y not be sold or us dress of any politic	sed by any pers al committee to	on for the purpose of soliciting contributions a solicit contributions from such committee.
NAME OF COMMITTEE (in Full) Volunteer PAC				
Full Name (Lest, First, Middle Infilal) A. Faith Geier				Date of Receipt
Mailing Address 10 Grecie Sq				05 18 2005
City	State	Zip Code		Transaction ID, 50718.C46063
New York	NY	10028-8031		Amount of Each Receipt this Period
FEC ID number of contributing federal political committee	C coo)344 85 3		2000.00
Name of Employer	Occupation			Earmarked(Nondeposited)
Receipt For:	Aggregate	Year-to-Date 🔻		(MEMO ITEM)
Primery General Other (specify) w			5000.00	Earmarked For ALLEN, GEOR- GE, Senste, VA, 00
Full Name (Lest, First, Middle Inibal) B. Full-Geer	<u>.l. </u>			Date of Receipt
Mailing Address 10 Gracie Sq				05 1B 2005
City	State	Zip Ceda		Transaction ID: 50718 C46931
New York	NY	10028-8031		Amount of Each Receipt this Period
FEC ID number of contributing federal political committee	C cm	368183		2000.00
Name of Employer self	Occupation Homemal			Earmarked(Nondepositac)
Receipt For: Primary General Other (specify) •	Aggregate	Year-lo-Date Y	5000.00	[MEMO ITEM] Earmarked For TALENT, JAM- ES MATTHES Senate MO,00
Full Name (Last, First, Middle Initial) C. Full Geter	<u> </u>			Dale of Receipt
Mailing Address 10 Gracie Sq				05 18 2005
City	Siste	Zip Cede		Transaction ID: 50718.C48098
New York	NY	10028-8031		Amount of Each Receipt this Penod
FEC ID number of contributing federal political committee.	C / CD0:	366237		2000.00
Name of Employer solf	Occupation Harnemak			Earmarked(Nondeposited)
Receipt For: Primary General Other (specify) •	Aggregate	Year-to-Date 🔻	5D00.00	[MEMO ITEM] Earmarked For CHAFEE, LIN- COLN D. Senate, RI, UD
SUBTOTAL of Receipts This Page (optional)	910 10 101 00 100 00 100 00 ggt 00 0)			0.00
TOTAL This Period (last page this line number	r only)			

SUBTOTAL of Receipts This Page (optional).

TOTAL This Period (last page this line number only)



FOR LINE NUMBER: PAGE 77 / 1271 SCHEDULE A (FEC Form 3) Lise separate schedule(t) (chack only one) or each category of the ITEMIZED RECEIPTS X 11a 11b 116 110 Detailed Summary Page 12 T 13a 1**3**b 14 Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (In Full) Santorum 2006 Full Name (Last, First, Middle Inklat) Date of Receipt MR. JAMES R. BOUGHTON Mailing Address 216 S. BAYSHORE DRIVE 06 2005 Transaction ID: SA11.10073251 Zip Code State Calv 44408-8343 Amount of Each Receipt this Period OH COLUMBIANA FEG 10 mamber of contributing 500.00 federal political commutee. CONTRIBUTION Occupation Name of Employer Timit increased Due to Opponent's Spending (2 U.S.C. 4418(i)/441a-1) C.E.O. 2008 Election Cycle-to-Date Receipt For: General X Primary 500.00 Other (specify) w Full Name (Last, First, Middle Initial) Date of Receipt B. MR. ROBERT A. BOURNE Mailing Address P.O. BOX 4920 2005 26 04 Transaction ID: SA11.10065970 State Zip Code Cily Amount of Each Receipt this Period OBLANDO FI \$2802-4920 FEC ID number of combibuling 2000.00 ¢ federal collical committee. CONTRIBUTION **OCCUPATION** Name of Employer C.N.L. FINANCIAL GROUP, Limit Increased Due to Opponent's Spending (2 U.S.C. 441a(i)441a-1) PRESIDENT & TREASURER 2008 Election Cycle-to-Date Receipt For. X Primary General 2000.00 Other (specify) w Full Name (Last, First, Middle Inilial) Date of Receipt C, MR. JACK O. BOVENDER, JR. Mailing Address 520 BELLE MEADE BLVO 06 2005 30 Transaction ID: SA11.10076532 Zip Code State TN 37205 Amount of Each Receipt this Period MASHVILLE FEC ID number of contributing 2000.00 C federal politices committee. CONTRIBUTION Name of Employer H. G. A. Occupation Limit Increased Dus to Opponent's Spending (2 U.S.C. 441a(1)441a-1) C. E. D. Election Cycle-10-Date Y Recaigt For: 2006 General X Primary 2000.00 Other (specify) -4500.00

FEC Schedule A (Forth 2) Rev. 02/2009

SCHEDULE A (FEC Form 3X)

Use separate schedule(s)

FOR LINE	NUMBER	e: PAG	PAGE 36 / 718					
(check only	onej							
X 118	116	110	12					
13	14	15	□ 16 i	T 17				

ITEMIZED RECEIPTS		Detailed Summary F	⊃age	X 118 11b 11c 12 13 14 15 16 1
Any information copied from such Reports and \$\displaystar{\text{cr} for commercial purposes, other than using the	Statements ma e name and ad	y not be sold or used by dress of any political co	y any persor annaise to s	for the purpose of soliciting contributions * elicit contributions from such committee.
NAME OF COMMITTEE (In Full) Volunbeer PAC				
Full Name (Lest, First, Middle Initial) A. Jack Bovender				Date of Receipt
Mailing Address 520 Belle Meade Blvd	-			04 21 2005
Cily	State	Zip Code		Transaction ID. 50718 C46090
Nashville	TN	37205-3424		Amount of Each Receipt this Period
FEC ID number of contributing federal political committee	C co	1366237		2000.00
Name of Employer HCA	Occupation	1	· · · · · · · · · · · · · · · · · · ·	Eermarked(Nondeposited)
Receipt For:		Year-to-Date 🔻		(MEMO ITEM)
Primary General Other (specify) y			0.00	Earmarked For CHAFEE, LIN- COLN D. Senate, RI, DD
Full Name (Lest, First, Middle Initial) B. Jack Bovender	<u> </u>			Date of Receipt
Mailing Address 520 Belle Meade Blvd				04 21 2005
City	8late	Zip Coda		Transaction ID: 50718.C46670
Nashville	TN	37205-3424		Amount of Each Receipt this Period
FEC ID number of contributing federal political committee C CD0365106				2000.00
Name of Employer HCA	Gocupation GEO	1		Earmarked(Nondepositad)
Receipt For: Primary General Other (specify) •	Aggregate	Year-to-Date ♥	0.00	(MEMO ITEM] Earmarked For SANTORUM, RICHARD J, Senate, PA DO
Full Name (Last, First, Middle Initial) Jack Bovender	<u> </u>	V		Date of Receipt
Mailing Address 520 Belle Meade Blvd				04 26 2005
City	Slate	Zip Cede		Transaction ID: 50426 C15042
Nashville	TN	37205-3424		Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C			5000.00
Name of Employer HCA	CEO			Receipt
Receipt For:	Aggregate	Year-to-Date 🔻		
Primary General Other (specify) •	,	5000	0.00	
SUBTOTAL of Receipts This Page (optional)			-· •	5000.00
TOTAL This Period (last page this line number o				